


IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

IN THE MATTER OF THE APPLICATION  
OF THE UNITED STATES OF AMERICA  
FOR A WARRANT AUTHORIZING THE  
SEARCH OF: Mail parcel  
1ZW4Y4420125953082  
(the PARCEL)

Case No. 3:21-MJ-00236MMS

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

 I, Dale Boothroyd, am a Task Force Officer with the Drug Enforcement Administration (DEA), in the Anchorage, Alaska, District Office, and in that capacity declare and state as follows:

1. I have been employed as a Task Force Officer with the Drug Enforcement Administration since October of 2018. Prior to my assignment with the Drug Enforcement Administration, I was assigned to the Statewide Drug Enforcement Unit with the Alaska State Troopers from April 2018 to September 2018. Prior to my assignment with AST, I was assigned to uniformed patrol with the Anchorage International Airport Police/Fire Department for six years. Thus, in total I have approximately 10 years of law enforcement experience.


2. During the course of your affiant's law enforcement career, I have written and/or executed numerous search and seizure warrants for narcotics, dangerous drugs, and related records, and assisted in the seizure of hundreds of thousands of dollars in proceeds and/or assets derived from such illegal activity.

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3. During the course of my employment as a Law Enforcement Officer, I have gained experience in conducting drug investigations and have received the benefit of many years of such experience of fellow agents, investigators and officers.

4. During the course of my employment with the these three agencies, I have worked in an undercover capacity and conducted investigations of controlled substances violations in conjunction with agents, investigators and officers from other jurisdictions. I have also worked with and conducted investigations utilizing confidential sources. I have also conducted or assisted in investigations which have led to the arrest and conviction of persons for violations dealing with the sale, possession and/or manufacture of controlled substances, and the seizure and forfeiture of assets. As part of these investigations, I have able to interview arrested subjects and their associates. Through these interviews, your Affiant has learned how and why these offenders conduct various aspects of their drug trafficking activities, to include communicating, manufacturing, packaging, distribution, transportation and concealment of controlled substances and assets and money laundering.

5. I attended the Alaska Law Enforcement Training Academy #12-02 where I received 947 hours of training. I have obtained my Intermediate Police Certificate from the Alaska Police Standards Council. I have attended a 40 hour "Task Force Officer" school in Quantico, VA administered by the Drug Enforcement Administration. I have attended a 40 hour "Jetway" training course presented by the Drug Enforcement Administration and El Paso Intelligence Center. I have attended a 40 hour "Undercover Survival and Tactics" course presented by the Midwest Counterdrug Training Center. I have also attended a 7 hour course on Drugs in Alaska at the State Crime Laboratory. I

 have obtained an A.A.S degree from Finger Lakes Community College, graduating in 2009 with a major in Conservation Law Enforcement.

6. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included in this affidavit every detail of every aspect of the investigation. Rather, I have set forth facts that I believe are sufficient to establish probable cause for the issuance of the requested search warrant. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

7. I make this affidavit based, in part, on personal knowledge derived from my participation in this investigation and, in part, upon information and belief. The sources of my information and belief are: (a) oral and written reports about this and other investigations, which I have received directly or indirectly from officers/agents of the Drug Enforcement Administration (DEA); as well as sources of information as identified herein (b) and physical surveillance conducted by law enforcement entities which was reported to me directly or indirectly. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant, and does not set forth all of my knowledge about this matter. Facts not set forth herein are not being relied upon in reaching my conclusion that probable cause exists for the issuance of a search warrant. Nor do I request that this Court rely upon any facts not set forth herein when reviewing this affidavit in support of an application for a search warrant.

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**PURPOSE OF AFFIDAVIT**

8. I submit this affidavit in support of my application to search mail parcel 1ZW4Y4420125953082 (the PARCEL), presently located at the Anchorage District Office of the Drug Enforcement Administration.

9. As more fully set forth herein, I submit there is probable cause to believe that search of mail parcel 1ZW4Y4420125953082 (the PARCEL), will lead to evidence, fruits, and instrumentalities of violations of Title 21, Section 846 and 841(a)(1) - Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances; and Title 18, United States Code, Section 1956(h) – Conspiracy to Launder Money.

10. This investigation relates to the commission of the following offenses, among others:

- a. Title 21, United States Code, Section 846 and 841(a)(1) - Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances;
- b. Title 18, United States Code, Section 1956(h) - Conspiracy to Launder Money.

**REQUEST TO THE COURT**

11. I respectfully ask the Court to grant law enforcement the authority to open and search the PARCEL for evidence of drug trafficking conspiracy, controlled substances, packaging materials and or materials indicating ownership and control of the controlled substances, at any time of the day or night.

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**BACKGROUND INFORMATION ABOUT SUBJECT PARCELS**

12. Based on my experience, training and discussions with other law enforcement officers experienced in drug investigations, I know that certain indicators exist when persons use the shipping/ mailing systems to ship controlled substances from one location to another. Indicators for parcels that contain controlled substances include, but are not limited to the following:

- a. It is a common practice for the shippers of the controlled substances to use expedited shipping because the drugs arrive within three to four days, but this may vary in Alaska due to geographical location and weather. This service is also commonly used so the parcel can be tracked.
- b. Shippers of controlled substances will utilize cash as payment instead of credit or debit cards. These payment practices are used by narcotics traffickers to hide their true identity and make it difficult for Law Enforcement to identify them.
- c. These parcels in many instances contain a fictitious return address, incomplete return address, no return address, the return address is same as the addressee address, or the return address does not match the place where the parcel was mailed from. These packages are also sometimes addressed to or from a commercial mail receiving agency (i.e., FedEx Store). These address practices are used by narcotics traffickers to hide the true identity of the person(s) shipping and/or receiving the controlled substances from law enforcement officials.

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- d. In order to conceal the distinctive smell of controlled substances from narcotic detector dogs, these packages tend to be wrapped excessively in bubble-pack and wrapping plastic, and are sometimes sealed with the use of tape around all the seams. Also, the parcels often contain other parcels which are carefully sealed to prevent the escape of odors. Sometimes perfumes, coffee, dryer sheets, tobacco or other smelling substances are used to mask the odor of the controlled substances being shipped.
- e. When the shipper mails controlled substances from a particular area/state, the proceeds from the sale of the controlled substances may be returned to the shipper. Based on experience and discussions, there are known source states where narcotics are mailed from, including California, Oregon, Washington, Arizona, Texas, Puerto Rico and Nevada.
- f. I know from training and discussions with other law enforcement officers that the following controlled substances are likely to be found during parcel interdictions: marijuana, methamphetamine, cocaine, LSD, psilocybin mushrooms, heroin, opium, MDMA, and proceeds from the sale of narcotics.

04/20/21

PROBABLE CAUSE

13. On 4/21/2021, DEA in Anchorage was contacted by an employee of a mail shipping facility in Anchorage, AK. The employee wanted to report a suspicious package.

14. The PARCEL was sent from "Miguel RIVERA" at 4611 Juneau Street Apt. 8, Anchorage, AK 99505 and was addressed to "Joseph LOPEZ" at 1123 W. Florence Avenue, Los Angeles, CA 90044. The PARCEL is a brown cardboard box approximately 13" X 13" X 12" and weighing approximately 5 pounds. The shipper paid \$182.00 in cash to ship the package and claimed it was clothing. A photograph of the Subject Parcel is included in **Attachment A**.

15. The Subject Parcel contains indicators that in my training and experience are consistent with packages known to contain contraband.

- a. The actual shipper of the parcel was not "Miguel RIVERA", instead, an individual named Howard WILLS shipped the parcel.
- b. The Subject Parcel is being sent to California, a known source state for controlled substances. California is a known narcotics source state from which narcotics are shipped out and proceeds of narcotics sales are sent to.
- c. A search of a law enforcement database returned record of "Howard WILLS" although he did not currently or historically reside at the listed address. "Miguel RIVERA" also did not exist at the listed address for the shipper. The data provided by the law enforcement database is a

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combination of over 33 billion records from over 8,800 different data sources which are updated daily, weekly, monthly, and annually, depending on the particular data source.

- d. A search of a law enforcement database returned record of "Joseph LOPEZ" associated to the recipient address, "1123 W. Florence Avenue, Los Angeles, CA 90044."
- e. Upon handling the parcel, Agents can feel a large solid object moving around on the inside of the parcel, not consistent with clothing.

16. On 4/20/2021, K-9 Officer C. Scott was requested to conduct a K-9 sniff with K-9 "Skye" on the PARCEL. On 4/20/2021 at approximately 1130 hours, Officer Scott advised "Skye" exhibited a change in behavior consistent with the presence of an odor of a controlled substance the canine is trained to recognize. Attached hereto as **Attachment C** and incorporated herein by reference is a true and correct copy of a written statement provided by K-9 Officer Scott, which sets forth "Skye's" training and experience as a narcotics detector dog.

17. Based on the above, and based on my training and experience, I submit there is probable cause to believe that the PARCEL contains evidence of drug trafficking conspiracy/money laundering conspiracy to include controlled substances, U.S. Currency, packaging materials and or materials indicating ownership and control of the controlled substances.

18. I respectfully ask the Court to grant law enforcement the authority to open and search the PARCEL for evidence of drug trafficking include drug proceeds,



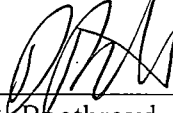
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controlled substances, packaging materials and or materials indicating ownership and control of the controlled, at any time of the day or night.

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Respectfully submitted,



Dale R. Boothroyd  
Task Force Officer  
Drug Enforcement Administration

**Signed digitally and sworn telephonically this date:**

Apr 20, 2021

The Hon.  
UNITED STATES MAGISTRATE JUDGE

